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Attorneys for Progressive Casualty Insurance Company

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

TANISHA BOZEMAN,)

)

Plaintiff,)

)

vs.)

)

PROGRESSIVE CASUALTY) Case No. 3:05-cv-178-JKS
INSURANCE COMPANY and)
INTEGRITY INSURANCE)
AGENCY, LLC)

)

Defendant.)

)

AFFIDAVIT OF COURT CHAMBERS

STATE OF CALIFORNIA)

)ss.

SACRAMENTO COUNTY)

Cort Chambers, being first duly sworn, deposes and states as follows:

1. I am employed by Progressive Casualty Insurance Company. My title is Senior Casualty Specialist. I have personal knowledge of the matters set forth herein.
2. On January 3, 2006, Gary Zipkin called me to tell me that he and plaintiff's attorney had agreed to recommend to their clients that this matter be settled for a total payment of \$25,350.
3. I informed Mr. Zipkin that he had my authority to settle this case for a payment by Progressive of \$25,350, in exchange for a dismissal of the action and a signed release providing protection against any liens.
4. Mr. Zipkin then called me back on the same day, January 3, 2006, and told me that he had reached agreement with plaintiff's attorney to settle this matter on those terms.
5. Mr. Zipkin also told me that, after agreeing to the settlement, Mr. Maloney told him that the settlement would have to be conditioned on Integrity not obtaining an award of attorney's fees against Ms. Bozeman. I subsequently learned that Integrity did seek attorney's fees and that Mr. Maloney would not honor the settlement.

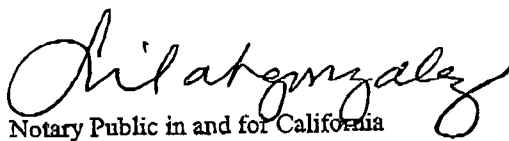
FURTHER AFFIANT SAYETH NAUGHT.

DATED at Sacramento, California, this 13th day of April, 2006.



Cort Chambers

SUBSCRIBED and SWORN to before me this 13th day of April, 2006.



Notary Public in and for California

My Commission Expires: 9/26/2006